

**STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2021-88-E**

IN RE:

Dominion Energy South Carolina, Inc.'s
2021 Avoided Cost Proceeding Pursuant to
S.C. Code Ann. Section 58-41-20(A)

**SOUTH CAROLINA DEPARTMENT
OF CONSUMER AFFAIRS' SECOND
SET OF INTERROGATORIES AND
REQUEST FOR PRODUCTION TO
DOMINION ENERGY SOUTH
CAROLINA, INC.**

Pursuant to S.C. Code Ann. Regs. 103-833, the South Carolina Department of Consumer Affairs (the "Department"), by and through its undersigned counsel, hereby submits this Second Set of Interrogatories and Request for Production to Dominion Energy South Carolina, Inc. ("DESC" or "Company"). Pursuant to South Carolina Rule of Civil Procedure 26(e) and Commission regulations, each request is continuing until the time of the hearing such that the Company must promptly transmit to the Department the requested information as it becomes available.

INSTRUCTIONS

1. Responses to these requests should be provided to the undersigned, via email, within twenty (20) days of the date of service.
2. All information should be provided to the undersigned in the format requested and under oath.
3. All responses to the below requests should be labeled using the same numbers as used herein.

4. If the requested information is found in other places or in other exhibits, reference shall not be made to those, but instead, the information should be reproduced and placed in the responses to this request in the appropriate sequence.

5. All documents shall be provided in their native format, e.g., in Word, Excel, or PowerPoint format with all functions, data, and formulas intact.

6. Each request should be reproduced at the beginning of the response thereto.

7. If the response to any Request for Production of Documents is that the information requested is not currently available, please state when the information requested will become available.

8. This request shall be deemed continuing so as to require DESC to supplement or amend its responses as any additional information becomes available up to and through the date of hearing.

9. For any document withheld under a claim of privilege, submit a sworn or certified statement from your counsel or one of your employees in which you identify the document by author, addressee, date, number of pages, and subject matter; specify the nature and basis of the claimed privilege and the paragraph of this demand for documents to which the document is responsive; and identify each person to whom the document or its contents, or any part thereof, has been disclosed.

10. If a refusal to respond to a Request for Production of Documents is based on the grounds that same would be unduly burdensome, identify the number and nature of documents needed to be searched, the location of the documents, and the number of hours and costs required to conduct the search.

11. Answer each request on the basis of the entire knowledge of DESC, including information in the possession of DESC or its consultants, representatives, agents, experts, operating divisions, business divisions, assigns, partners, and attorneys, if any.

12. If any request cannot be answered in full, respond to the extent possible and specify the reasons for DESC's inability to respond.

DEFINITIONS

As used herein, the following terms shall have the meaning and be interpreted as set forth below:

1. "You," "your," and "Company" mean DESC or any of its affiliates, officers, directors, employees, attorneys, or agents.

2. "Application" is defined as the application filed by Dominion Energy South Carolina, Inc. on April 22, 2021 or as otherwise revised.

3. "Company" and "DESC" are defined as Dominion Energy South Carolina, Inc., its parent(s), subsidiaries, affiliates, predecessors, successors, officers, directors, agents, employees, and other persons acting in its behalf.

4. "Workpapers" and "documents" are defined in the broadest terms and should not be construed as limited to the listed examples, or limited only to items that are currently within your control or custody; include each and every original or copy of words or information generated by printing, typing, longhand, electronic recording, or other process, regardless of the form thereof, and include any kind of writing. Such documents include, but are not limited to, published materials, reports, correspondence, emails, records, memoranda, notices, notes, marginal notations, messages, teletype printouts, statements, books, studies, minutes, diagrams, drawings,

maps, surveys, plans, charts, graphs, data, computer files, billings, evaluations, photographs, audio tapes, and videotapes. The terms include drafts, revisions or amendments of any of the above, and generally, any kind of tangible, permanent records that are now, or formerly were, in your possession, custody or control, or that were known by you to exist, and that can be located or discovered by reasonably diligent efforts.

5. "Communication(s)" when used in these Requests shall include the transmittal of information by any means, written, oral, electronic or otherwise.

6. When used in referenced to a document, "identify," identity," and "identification" mean to state the type of document (e.g., computer-stored information, microfilm, letter, memorandum, policy circular, minute book, telegram, chart, etc.), or some other means of identifying it, and its present location and custodian. If any such document was, but no long is, in your possession or subject to your control, state what disposition was made of the document, and if the document was destroyed or disposed of pursuant to a retention policy, please state the retention policy.

DOCUMENT AND INFORMATION REQUESTS

2-1 For the purposes of this request, please refer to the Second Amended Application, page 7 which presents the PR-1 Rate proposed by the Company.

- a.** Please provide a detailed narrative explaining the Company's rationale for dividing PR-1 Rate for avoided capacity between solar and non-solar QFs.
- b.** Is it the Company's position that generation from solar QFs during periods of maximum system needs is of different value than generation from non-solar QFs during the same period?

- c. Confirm that solar QFs could be compensated for avoided capacity under the same three-hour window method proposed for non-solar QFs.

2-2 For the purposes of this request, please refer to the Direct Testimony of Eric H. Bell. Please provide all charts included in Mr. Bell's testimony in electronic form with all workpapers used in its construction. Please provide the requested documents in electronic form with all spreadsheet links and formulas intact, source data used, and explain all assumptions and calculations used. To the extent the data requested is not available in the form requested, provide the information in the form that most closely matches what has been requested.

2-3 For the purposes of this request, please refer to Exhibit JWN-1 attached to the Direct Testimony of James W. Neely. Please provide the ELCC results included on page 2 of the referenced exhibit in electronic form. Please provide the requested documents in electronic form with all spreadsheet links and formulas intact, source data used, and explain all assumptions and calculations used. To the extent the data requested is not available in the form requested, provide the information in the form that most closely matches what has been requested.

2-4 For the purposes of this request, please refer to the Direct Testimony of James W. Neely, page 8 lines 5 through 8, where he states:

Avoided energy costs are calculated for calendar years 2022 through 2031. These ten years are divided into two groups of five years each: 2022-2026, and 2027-2031 for each of the 11 time-of-production periods.

- a. Please define the 11 time-of-production periods the Company examined in its calculations of avoided energy costs for the Standard Offer.

- b.** Please provide the referenced avoided energy costs for the 11 time-of production periods associated with the period 2022-2026.
- c.** Please provide the referenced avoided energy costs for the 11 time-of production periods associated with the period 2027-2031.
- d.** Please provide all workpapers responsive to parts (a) through (c) above in electronic form with all spreadsheet links and formulas intact, source data used, and explain all assumptions and calculations used. To the extent the data requested is not available in the form requested, provide the information in the form that most closely matches what has been requested.

2-5 For the purposes of this request, please refer to the Direct Testimony of James W. Neely, page 8 lines 15 through 20, where he states:

To calculate the avoided capacity costs for both non-solar and solar QFs, DESC uses the DRR methodology described above to determine the incremental capital investment related revenue needed to support the appropriate resource plan using a change case that considers the impact of a purchase from a 100 MW facility. The avoided capacity cost is the difference between the incremental capacity costs in the base resource plan and the change plan.

- a.** Please provide a detail narrative explaining the Company's rationale for choosing to consider the impact of a purchase from a 100 MW facility in determining avoided capacity costs for non-solar and solar QFs.
- b.** Please identify the average facility nameplate capacity associated with all QFs attached to the Company's system.
- c.** Please identify the average facility nameplate capacity associated with non-solar QFs attached to the Company's system.

- d. Please identify the average facility nameplate capacity associated with solar QFs attached to the Company's system.
- e. Please provide all workpapers responsive to parts (b) through (d) above in electronic form with all spreadsheet links and formulas intact, source data used, and explain all assumptions and calculations used. To the extent the data requested is not available in the form requested, provide the information in the form that most closely matches what has been requested.

2-6 For the purposes of this request, please refer to Exhibit PBD-2 attached to the Direct Testimony of Peter B. David. Please provide all tables and figures included in Exhibit PBD-2 in electronic form with all workpapers used in their construction. Please provide the requested documents in electronic form with all spreadsheet links and formulas intact, source data used, and explain all assumptions and calculations used. To the extent the data requested is not available in the form requested, provide the information in the form that most closely matches what has been requested.

****signature and certificate of service on following page****

Respectfully submitted this 13th day of July 2021,

S.C. DEPARTMENT OF CONSUMER AFFAIRS



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CERTIFICATE OF SERVICE

I, Connor Parker, hereby certify that the foregoing document was served by electronic mail on all parties at the addresses listed in the official service list for Docket 2021-88-E on July 13, 2021.



Connor Parker, Esq.